

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM BEREZOWITZ, et al.,)
Plaintiffs,) Hon. Joan B. Lefkow
v.) Case No. 08-cv-1756
J&R VENTURES, LLC and)
JOHN ORECCHIO,) Magistrate Judge Arlander Keys
Defendants.)

**DEFENDANT JOHN ORECCHIO'S MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, John Orecchio ("Orecchio"), by and through his attorneys, hereby moves this Honorable Court for an Extension of Time to Answer or Otherwise Plead to Plaintiffs' Complaint. In support of his Motion, Orecchio states as follows:

1. Plaintiffs filed this action on March 26, 2008. On March 28, 2008, Plaintiffs' counsel sent Orecchio a waiver of service form, which he executed, giving him until May 27, 2008, to respond to the Complaint.
2. On May 27, 2008, Plaintiffs' counsel granted Orecchio an additional ten days to respond to the Complaint.
3. Nevertheless, Orecchio's counsel has not had sufficient time to formulate a response to Plaintiffs' Complaint. As Plaintiffs' counsel knows, until very recently, Orecchio's counsel was otherwise predisposed on a lengthy trial in front of Judge St. Eve.
4. Consequently, Orecchio respectfully requests an additional twenty one days to file a response to Plaintiffs' Complaint.

5. Orecchio submits that this motion is not made for purposes of delay or to otherwise prejudice Plaintiffs claims. Indeed, it is Orecchio's understanding that the other defendant, J & R Ventures, has not been served. Therefore, extending Orecchio's answer date will not delay the adjudication of this matter.

WHEREFORE, for the forgoing reasons, Defendant John A. Orecchio respectfully requests the Court to enter an order granting him an additional twenty one days to answer or otherwise plead to Plaintiffs' Complaint and any other relief the Court deems equitable and just.

Dated: June 6, 2008

Respectfully submitted,

JOHN A. ORECCHIO

By: /s/ Henry M. Baskerville
One of his Attorneys

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CERTIFICATE OF SERVICE

I, Henry Baskerville, an attorney, certify that I caused copies of the foregoing **Motion for Extension of Time to Answer or Otherwise Plead** to be served on the attorneys listed below via the Court's CM/ECF system this 6th day of June, 2008.

/s/ Henry M. Baskerville

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